

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL No. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge
Geraldine Soat Brown

PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiffs, by and through their attorneys, respectfully request leave to file documents under seal ("Motion for Leave") and state the following:

1. Simultaneously with this Motion for Leave, Plaintiffs have filed their Response to Nichols' Second Objections to Plaintiffs' Motion for Preliminary Approval of Class Settlement.
2. Plaintiffs' Response is supported by documents that quote and/or cite non-public information designated "PROTECTED HEALTH INFORMATION" and/or "CONFIDENTIAL" by Defendant under the Agreed Protective Order dated March 7, 2012 in *Arrington v. National Collegiate Athletic Association*, No. 11-cv-06356 (Dkt. No. 57). The documents that contain information so designated include:
 - a. Plaintiffs' Response to Nichols' Second Objections to Plaintiffs' Motion for Preliminary Approval of Class Settlement;
 - b. Exhibit A to Plaintiffs' Response: Plaintiff's Exemplar Proffer of Facts Concerning the *Arrington* Plaintiffs' Individual Experiences.
3. Plaintiffs have simultaneously filed public-record versions of the documents with the Confidential Information redacted. *See* Agreed Confidentiality Order, ¶ 7(b) (requiring the

electronic filing of “a public-record version of the document with the Confidential Information excluded”).

4. Accordingly, Plaintiffs respectfully request leave to file unredacted copies of the documents listed in ¶ 2 under seal.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion For Leave To File Documents Under Seal, and grant such other and further relief as this Court deems appropriate.

Dated: September 14, 2015

Respectfully submitted,

By: /s/ Steve W. Berman
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Co-Lead and Settlement Class Counsel

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on September 14, 2015 a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: */s/ Steve W. Berman*